

MDP/de
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Docket No.:

-----X
MARIO A. SOBERS,

NOTICE OF REMOVAL

Plaintiff,

SUPREME KINGS

-against-

Index No.:

519777/2021

HARMONY GREENHOUSES, LLC and EDGAR
REYES,

Defendants demand

Trial by jury

Defendants.
-----X

PLEASE TAKE NOTICE, that the within is a true copy of a Notice of Removal filed in the above named Court.

1. This action is being removed from Supreme Court, Kings County to the United States District Court for the Eastern District of New York.
2. The basis for removal is 28 U.S.C. §1441(b) and 28 U.S.C. 1332.
3. The Court has original jurisdiction pursuant to 28 U.S.C. §1332(a) in that the plaintiff, MARIO A. SOBERS, resides at 162 Troy Avenue, Apartment 13D, Brooklyn, New York 11213 and is a citizen and resident of Kings County, New York; and defendant, HARMONY GREENHOUSES, LLC resides at Marble Hill Road, Phillipsburg, New Jersey 08865 and defendant, Edgar Reyes resides at 140 South Main Street, Phillipsburg, New Jersey 08865 and are both residents and citizens of Warren County, New Jersey; and the matter in controversy exceeds the sum or value of \$150,000.00 exclusive of interest and costs as set forth for the first time in plaintiff's April 1, 2022 Response to Demands Pursuant to CPLR §3017(c), a copy of which is filed herewith.

Dated: New York, New York
April 12, 2022

Yours, etc.,

BY: Marguerite D. Peck
MARGUERITE D. PECK
DOWNING & PECK, P.C.
Attorneys for Defendants
17 Battery Place - Suite 324
New York, New York 10004
212-514-9190

TO: Mark J. Linder, Esq.
HARMON, LINDER & ROGOWSKY, ESQS.
Attorneys for Plaintiff
3 Park Avenue - 23rd Floor - Suite 2300
New York, New York 10016